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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SENAIDA MACIAS PEÑA,)	Case No. 1:21-cv-00301-EPG
)	
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	
)	(ECF No. 24)
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 10-day extension of time, from August 25, 2022 to September 6, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S REPLY BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's fourth request for an extension of time and Defendant's first request. Counsel for the Plaintiff is currently out of State attending to an emergency with her ill father. (see attached declaration). Additional time will be needed in light of limited access to her computer.

1 Counsel requires additional time to brief the issues thoroughly for the Court's
2 consideration. Defendant does not oppose the requested extension and similarly requires
3 additional time to review and brief the issues, as the current volume of briefs she has due in
4 October is two to three times the amount normally assigned. Considering Counsel's other non-
5 litigation assignments, this is not compatible with giving each case due attention for briefing or
6 consultation with agency personnel regarding settlement. Counsel apologizes to the Defendant
7 and Court for any inconvenience this may cause.

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9 Respectfully submitted,

10 Dated: August 25, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

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12 By: /s/ Dolly M. Trompeter
13 DOLLY M. TROMPETER
Attorneys for Plaintiff

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15 Dated: August 25, 2022

PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

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20 By: */s/ Armand D Roth
Armand D Roth
Special Assistant United States Attorney
Attorneys for Defendant
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22 (*As authorized by email on August 25, 2022)
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ORDER

Based on the above stipulation (ECF No. 22), IT IS ORDERED that Plaintiff shall file Plaintiff's reply no later than September 6, 2022.

IT IS SO ORDERED.

Dated: **August 26, 2022**

/s/ Eric P. Grogg
UNITED STATES MAGISTRATE JUDGE